## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

Plaintiff.

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C.A. No. 04-1205-SLR

JURY TRIAL OF 12 DEMANDED

HARRY M. FREEDMAN, M.D., DONNA BURNS, DR., and MAJOR R. L. HUGHES,

Defendants.

## **NOTICE OF SERVICE**

I, DIANE M. ANDREWS, ESQUIRE, hereby certify that DEFENDANT, HARRY M. FREEDMAN, M.D.'s, RESPONSE TO PLAINTIFF'S MOTION (filed 7/28/06) was served via e-filing to the following individual(s):

Jeffrey Alonzo Simms SBI #198625 Delaware Correctional Center Unit V-Building A-Tier 1181 Paddock Road Smyrna, DE 19977

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ELZUFON, AUSTIN, REARDON, TARLOV & MONDELL, P.A.

/S/Jeffrey M. Austin
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Attorney for Defendant,
Harry M. Freedman, M.D.

Dated: August 8, 2006

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## FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

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Plaintiff, : C.A. No. 04-1205-SLR

: TRIAL BY JURY OF: TWELVE DEMANDED

HARRY M. FREEDMAN, M.D., DONNA BURNS, DR., and

MAJOR R. L. HUGHES,

:

Defendants.

## DEFENDANT HARRY M. FREEDMAN, M.D.'S RESPONSE TO PLAINTIFF'S MOTION

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Motion, docketed on July 28, 2006, and states as follows:

1. This Motion is unintelligible and Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON TARLOV & MONDELL, P.A.

/S/Jeffrey M. Austin

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Attorney for Dr. Freedman

DATE: August 8, 2006

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